PCRM PHYSICIANS COMMITTEE FOR RESPONSIBLE MEDICINE
5100 WISCONSIN AVENUE, N.W., SUITE 400
WASHINGTON, DC 20016
T: (202) 686-2210 F: (202) 686-2216
PCRM@PCRM.ORG WWW.PCRM.ORG

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Michael O. Leavitt, Administrator
US Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Comments on the HPV test plan for the Triphenylboron category

The following comments on DuPont's test plan for the chemical category Triphenylboron are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

E.I. du Pont de Nemours & Company submitted its test plan on February 19, 2004, for the Triphenylboron category which consists of two chemicals: triphenylborane, or TPB (CAS No. 960-71-4) and triphenylboron compound with sodium hydroxide, or TPB-NaOH (CAS No. 12113-07-4). DuPont does not provide very specific information as to the function or purpose of using these chemicals, only stating that potential applications include olefin polymerization, agrichemicals, fuel additives, metal scavenging, and flame retardants. Most of the SIDS endpoints in the HPV program have been filled using existing data. However, DuPont proposes to conduct a combined repeated dose/reproduction/developmental screen, OEDC 422, and an acute fish toxicity study, OECD 203. If these studies are carried out, at least 795 animals will be killed.

Although there are no available data on repeated dose, reproduction, and developmental toxicity of triphenylborons *per se*, it is premature to conduct animal tests before determining the hydrolysis products of triphenylborons. DuPont mentions phenylboric oxide and phenylboronic acid as hydrolysis products of TPB and we concur with their proposal to conduct a hydrolysis study, OECD 111, to further characterize TPBs. We would like to ask the sponsor to conduct the hydrolysis study at the pH appropriate to the stomach conditions of mammals. If TPBs are, in fact, rapidly hydrolyzed to the phenylboron products, any toxic effects in mammals (chemical delivery by gavage), would be due to the component parts of TPBs, not the parent chemical(s). Once the resulting products are identified, their characteristics may preclude testing, or subchronic, reproductive, and developmental toxicity data may be available, thus eliminating additional animal studies.

With regard to fish toxicity, we disagree with DuPont's assessment that OECD 203 is needed to meet the requirements of the HPV program. Both TPB and TPB-NaOH have estimated partition coefficient values of 5.52 and 4.37, respectively. The EPA has stated that acute fish tests are inappropriate for compounds with log Ko/w values above 4.2. Rather than conduct an acute fish toxicity study which will result in the death of 120 fish, DuPont may want to consider confirming estimated log Ko/w values with measured data. Analysis of fish toxicity for compounds with log Ko/w values above 4.2 is not warranted.

Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at *meven@pcrm.org*.

Sincerely,

Megha Even, M.S.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Research